

**Elisha Kobre**

Partner

ekobre@bradley.com

214.257.9785 direct



## MEMORANDUM ENDORSED

March 16, 2023

### **VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 3/17/2023

**Re: *United States v. Srinivasa Kakkera, 22 Cr. 398 (GHW)***

Dear Judge Woods:

We write on behalf of defendant Srinivasa Kakkera to respectfully request, with the consent of the Government and Mr. Kakkera's Pretrial Services officer, a modification of Mr. Kakkera's conditions of release to allow him to stay at his brother's residence in Monroe Township, New Jersey from March 29, 2023 through April 1, 2023, the duration of his trip here from California for the upcoming March 30, 2023 pretrial conference in this case.

As the Court is aware, a pretrial conference in this case is scheduled for March 30, 2023, at 9:00 AM. Mr. Kakkera, who resides in the Northern District of California, plans to travel to New York for this court appearance and would like to stay with his brother, who resides in Monroe Township, New Jersey, for the duration of his trip. Per Mr. Kakkera's conditions of release, his travel is currently restricted to the Southern and Eastern Districts of New York, the Northern District of California, and points in between for travel to the Court and to meet with counsel. (Dkt. 32). Mr. Kakkera is also permitted to travel for work, with advance notice, to several other districts, but these do not include the District of New Jersey. Mr. Kakkera plans to arrive in New Jersey the morning of Wednesday, March 29, 2023, and to depart back to California on Saturday, April 1, 2023.

In order to stay with his brother during his trip for the March 30, 2023 court appearance, Mr. Kakkera respectfully requests a modification of his of his conditions of release to permit him to travel to and within the District of New Jersey during the period from March 29, 2023 through April 1, 2023.

I have corresponded via e-mail with both AUSA Noah Solowiejczyk and Brad Wilson, Mr. Kakkera's Pretrial Services officer in the Northern District of California, and both have no objection to the proposed modification. Mr. Kakkera has also already provided Mr. Wilson with his brother's address in New Jersey.

We therefore respectfully request that the Court grant the proposed modification.

The Honorable Gregory H. Woods

March 16, 2023

Page 2

---

Sincerely,



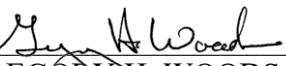
Elisha Kobre

Application granted. The conditions of Mr. Kakker's pre-trial release are modified as follows: Mr. Kakker may travel to and within the District of New Jersey during the period from March 29, 2023 through April 1, 2023. All other conditions of the defendant's pre-trial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 55.

SO ORDERED.

Dated: March 17, 2023  
New York, New York



---

GREGORY H. WOODS  
United States District Judge